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10
11 **UNITED STATES BANKRUPTCY COURT**
12 **EASTERN DISTRICT OF WASHINGTON**
13

14
15 IN RE:

16
17 EASTERDAY RANCHES, INC.,

18
19 Debtor.
20
21

Case No. 21-00141-WLH11

**JOINDER IN WEYN'S &
SUNRAY'S RESPONSE IN
SUPPORT OF MOTION FOR
ADEQUATE PROTECTION**



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(509) 248-4282

Joinder

-1-

1 J.R. Simplot Company, dba Simplot Western Stockmen's ("**Simplot**")
2
3 hereby joins in the response of Weyns Farms and Sunray Farms [ECF 563] to
4
5 the objections filed by the Unsecured Creditors' Committee and Washington
6
7 Trust Bank. Simplot has filed a joinder in the original motion for adequate
8
9 protection as Simplot is a feed supplier that has a perfected preparer's lien
10
11 under RCW 60.13.

12 1. Simplot delivered corn feed ("**Farm Products**") to the Debtors.
13
14 Simplot's preparer's lien attached and was automatically perfected upon
15
16 delivery of the Farm Products under RCW 60.13.030. The perfected
17
18 preparer's lien provides for super priority for a period of 20 days after
19
20 payment is due and remains unpaid.

21 2. The Debtors remain indebted to Simplot for the unpaid amounts
22
23 due under the Contract and invoices ("**Remaining Balances**"). The
24
25 Remaining Balances were due on January 15, 2021 for all Farm Products.
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1 3. After the Debtors failed to pay, Simplot filed a preparer lien
2 claim with the Washington State Department of Licensing on February 4,
3 2021 (DOL Filing No. 2021-035-4712-7).
4

5
6 4. Simplot has reviewed the Response in Support of Motion for
7 Adequate Protection and joins in the Response seeking the same remedy as
8 requested in the original motion.
9

10
11 DATED this 14th day of April, 2021.
12
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14

15 /s/ Joshua J. Busey
16 Joshua J. Busey (WSBA 34312)
17 Bailey & Busey PLLC
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